



The International Corporate Center, 555 Theodore Fremd Avenue, Rye, NY 10580

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December 29, 2022

VIA ECF

The Honorable Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Coverys Specialty Insurance Co. v. Sirota & Associates et al.
Civil Action Number: 1:22-cv-09421-RA

Dear Judge Abrams:

This firm represents the Plaintiff Coverys Specialty Insurance Company in the above-referenced matter. By this letter, we are seeking an adjournment of the Initial Conference ordered by the Court for January 17, 2023. Additionally, we are also seeking an adjournment of the submission of the joint Proposed Case Management Plan which is due on January 10, 2023. The reason for the request is that, to date, the Defendant Sirota has not yet appeared, answered or otherwise moved with regard to the Complaint; although, we have received verification that this Defendant was served on November 18, 2022 via the Secretary of State. Moreover, we have not yet attained service of the Complaint on the other Defendant Daniel Estrin. This being the case, we are anticipating being able to effectuate service on him soon.

Since we do not yet have joinder in the case, we are requesting that the dates for the Case Management Order be moved to early March. This will give time for service on Defendant Estrin and for him to appear.

This is the first request for an adjournment that Plaintiff has sought in this case. I do not know whether the Defendant Sirota consents to this request as he has not yet appeared. It should be noted that on December 20, 2022 I sent a courtesy copy of the Complaint and Affidavit of Service, as well as the Court's Order for the parties to submit the Case Management Plan and the Initial Conference date. To date, I have not received any communication from this Defendant.

In addition, I do not believe that the adjournment as requested above would impact any other scheduled dates.

In light of the foregoing, it is hereby proposed that the date for submission of the joint Case



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Management Plan be adjourned to March 10, 2023 and that the Initial Conference be adjourned to March 17, 2023.

The Court's courtesies and attention to this case are very much appreciated.

Respectfully submitted,

Linda Alster-Nelson

Linda Alster-Nelson (LAN 5480)

Cc

Sirota & Associates via email